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March 31, 2020

VIA ECF

Honorable Alvin K. Hellerstein
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Nakia Taylor v. City, et al.
18 CV 8421 (AKH)(RWL)

Your Honor:

So Ordered.
Al K. Hellerstein
3-31-2020

I am the Senior Counsel in the Special Federal Litigation Division of the New York City Law Department representing the City and Lieutenant Christopher Siani in this matter. Defendants write with the consent of plaintiff's counsel, Nicholas Mindicino, Esq., to respectfully request that the Court stay the present civil proceeding in its entirety for ninety (90) days in light of the recent developments surrounding the COVID-19 pandemic.

By way of background, Plaintiff commenced the instant lawsuit against the City of New York, the New York City Police Department ("NYPD"), and Lieutenant Christopher Siani, alleging, *inter alia*, that on or about July 6, 2017, Plaintiff was falsely arrested and assaulted by Lieutenant Christopher Siani, of the NYPD. (See Amended Complaint dated July 19, 2019, ECF Docket Entry No. 31).

On October 28, 2019, fact discovery in this action closed. See Civil Docket Entry No. 38. Thereafter, during the February 28, 2020 status conference that was converted to a settlement conference, the Court set a schedule for the Parties' completion of expert discovery, ordering (1) production of Defendants' expert report by March 27, 2020, (2) depositions of the defense and plaintiff's experts by April 10, 2020, and (3) a post-expert discovery status conference was ordered for April 24, 2020. See Civil Docket Entry No. 45.

To date, the parties have diligently engaged in discovery. Plaintiff's independent medical examination (hereinafter "IME") was performed on March 17, 2020. However, certain medical records of Plaintiff needed for Defense's expert's review, have not yet been received, likely due